



Colleen Gillis Snow
(703) 456-8114
gillissnow@cooley.com



HAND DELIVERY

July 30, 2009

Nicole Steele
Loudoun County Planning Department
1 Harrison Street, S.E.
Third Floor
Leesburg, VA 20175

RE: White's Ford Park Applications - SPEX 2008-0061, SPEX 2008-0062 and CMPT 2008-0020 - First Referral Comment Response Letter

Dear Nicole:

This letter constitutes the Applicant's response to Staff first submission review comments that we received July 13, 2009, from the Department of Community Planning regarding the above-referenced applications. Each Staff comment is noted in italics, followed by the Applicant's response, below.

Department of Community Planning

Comment 1: Land Use

Staff finds that the proposed use of the subject property for a regional park is consistent with the planned land use and is supported by the rural policies of the Revised General Plan.

Issues pertaining to impacts to environmental features, compatibility and traffic are discussed below.

Response: Comment acknowledged.

Comment 2: River and Stream Corridor Resources

Staff finds that the passive uses and development plan for the proposed regional park complies with the river and stream corridor resource policies of the Plan. Additional detailed information regarding the design and function of the proposed restroom facilities to be located within the floodplain is requested. Coordination between staff, the Health Department and the applicant are recommended to assure that in flood events that the restroom facilities do not create a health issue. Staff welcomes a meeting with the applicant to discuss these issues.

Nicole Steele
July 30, 2009
Page Two

Response: Comment acknowledged. We are interested in protecting any restrooms and would be happy to ensure such design considerations are incorporated at the time of site plan. However, it is important to note that the proposed restroom south of Hibler Road is located outside the floodplain.

Comment 3: Forests, Trees, and Vegetation

Staff recommends that as much of the existing vegetation and trees as possible be preserved on the site. Staff recommends that the existing forest cover and hedgerows which are to be preserved on the subject property be designated as tree conservation areas (TCAs) on the proposed Special Exception Plat. Staff recommends commitment to the long-term maintenance of the tree conservation areas (TCAs).

Response: The Applicant intends to preserve the existing forest cover and hedgerows at the property as identified on Sheet 5 of the Special Exception Plat.

Comment 4: Plant and Wildlife Habitats

Staff concurs with the Virginia Department of Conservation and Recreation's (DCR's) review and findings.

Response: Comment acknowledged and appreciated.

Comment 5: Lighting

Staff recommends that the applicant commit to providing site lighting which is the minimum intensity of lighting necessary for the operation of the proposed uses within the park. The proposed site lighting should be shielded and directed downward to reduce glare and spillage of light onto adjoining properties and the night sky.

Response: Comment acknowledged. The Applicant would be willing to agree to a development condition requiring a commitment to Staff's suggested lighting measures.

Comment 6: Historic and Archeological Resources

Based on staff's review of the survey reports, further consultation with the applicant and the County Staff is recommended to develop a cultural resource management plan for the property to avoid impacts to archaeological sites, ensure preservation of existing historic structure, and to site and design new structures so that they blend with the existing historic buildings and rural agricultural character of the property.

Response: NVRPA has several important goals and objectives for the design, development and management of its park areas. These goals and objectives include obligations to:

Nicole Steele
July 30, 2009
Page Three

- Acquire, preserve and protect regionally significant areas of exceptional natural, environmental, historic, cultural, recreational or aesthetic value;
- Balance the development of recreational amenities and opportunities with the preservation of natural, scenic, historic, cultural and other environmentally sensitive resources; and
- Maintain the integrity and quality of park and recreation facilities through continued careful development, operation and maintenance.

Consistent with these goals and objectives and as shown on the Special Exception Plat, the proposed park has been carefully designed around a number of archeological resources including four no-build areas, allowing important archaeological features to be preserved. Further, the Applicant plans to retain the Colonel White House and proposes that its surroundings will be an "interpretative area" allowing the building to continue to be an important resource despite the fact that the house and associated farm buildings are outside of the area and scope of the special exception.

In developing the park and undertaking final design of other necessary buildings, close attention will be paid to the natural, scenic, historic and cultural environment. It is also important to note that the positioning of the proposed park office and visitor center will allow these buildings to replace existing unattractive structures (of no architectural or historic merit), to further minimize impacts to the Property.

For the reasons provided above, the Applicant does not feel that a cultural resource management plan for the proposed park is necessary.

Comment 7: Compatibility

Staff finds that the proposed use of the subject property as a regional park is consistent with the land use and rural economic policies of the Revised General Plan. However additional consideration of the scale and intensity of the use, in particular the anticipated number of visitors and types of activities, should be provided and will be evaluated to determine their impacts and overall compatibility with the surrounding rural area.

Response: Comment acknowledged. Please see the updated Special Exception Plat and information submitted in our response letter dated July 1, 2009, for more information.

Comment 8: Traffic

The establishment of the proposed regional park on the subject property appears to have a "minimal traffic impact" and adequate provisions appear to have been provided to accommodate safe access to the site. Staff defers to the Office of Transportation Services for further review and comment on the application.

Response: Comment acknowledged.



Nicole Steele
July 30, 2009
Page Four

Please do not hesitate to call or email with any questions. We look forward to being scheduled for public hearing in September.

Warmest regards,

A handwritten signature in blue ink that reads "Colleen".

Colleen Gillis Snow

cc: Todd Hafner, Northern Virginia Regional Park Authority
Kate Rudacille, Northern Virginia Regional Park Authority
Lou Canonico, christopher consultants
Brian Nolan, christopher consultants
Tushar Awar, Gorove Slade
Molly Novotny, Cooley Godward Kronish LLP
Ben Wales, Cooley Godward Kronish LLP

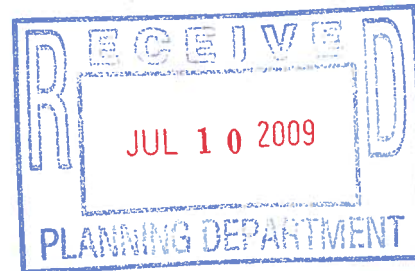
410131 v3/RE

Colleen Gillis Snow
(703) 456-8114
gillissnow@cooley.com

HAND DELIVERY

July 1, 2009

Nicole Steele
Loudoun County Planning Department
1 Harrison Street, S.E.
Third Floor
Leesburg, VA 20175



RE: White's Ford Park Applications - SPEX 2008-0061, SPEX 2008-0062 and CMPT 2008-0020 - First Referral Comment Response Letter

Dear Nicole:

This letter constitutes the Applicant's response to staff and agency first submission review comments that we received April 7 and April 15, 2009, regarding the above-referenced applications. We are still awaiting comments from Community Planning. Each staff and agency comment is noted in italics, followed by the Applicant's response, below.

Department of Building and Development – Environmental Review (comments dated March 18, 2009)

1. *The proposed boat ramp location crosses an area of very steep slopes along the bank of the Potomac. Staff recommends relocating the ramp to an area to the east that will not impact very steep slopes, consistent with ZO Section 5-1508(D).*

The exact location of the boat ramp has not yet been determined; however, the approximate location shown on the Concept Sketch was chosen because the water level there is deeper than the area to the east and it minimizes impacts to archeological resources. Also, this location accommodates full access, unlike the area to the east, which is limited by the Virginia Outdoor Foundation's no-build easement.

2. *The proposed entrance on the eastern portion of the property north of Hibler Road may impact very steep slopes, minor floodplain, and wetlands if widened beyond its current footprint. Due to these significant impacts staff recommends abandoning this proposed access point and utilizing this existing driveway as a secondary or emergency means of gaining access to the property. Please refer to the RGP Pages 5-26 (Steep Slope and Moderately Steep Slope Policies), and 5-6 (River and Stream Corridor Resources Policies). Also refer to the Loudoun County Revised Zoning Ordinance (ZO), Section 5-646, E.3.*

This roadway exists today to provide access to the home on the property. The Applicant plans to maintain this road in its current condition as an access point to the home and will follow the recommendation of staff that it serve only as a secondary or emergency access point for uses

Nicole Steele
July 1, 2009
Page Two

proposed with this application. The campsites located north of Hibler road will be accessed from a road situated farther to the west.

3. *A Wetland Delineation of the portion of the property north of Hibler Road has been prepared by Bowman Consulting and was submitted with this application. No such study has been provided for the Potomac floodplain portion of the property. Since the Loudoun County Predictive Wetland Model identifies potential wetlands within both segments of the property, staff recommends clarification of whether a wetland delineation has been conducted for the Potomac floodplain portion of the property and whether a Jurisdictional Determination has been issued by the U.S. Army Corps of Engineers (Corps). The jurisdictional determination is needed with this application to demonstrate compliance with the avoidance and minimization criteria required by Section 404 of the Clean Water Act and Section 9VAC25-210-115A of the Virginia Water Protection Permit Regulations. The jurisdictional determination is also needed to evaluate conformity with Policy 23 on Page 5-11 of the Revised General Plan (RGP) which states that "the County will support the federal goal of no net loss to wetlands in the County."*

If Federal permits are required from the Army Corps of Engineers because of potential impacts to wetlands, the project may be subject to Section 106 of the National Historic Preservation Act and impact mitigation for all register eligible archaeological sites or structures may be required through the Virginia Department of Historic Resources (VDHR). Staff will be happy to work with the applicant and the VDHR (if necessary) throughout this process.

Christopher Consultants completed a Wetland Delineation for the portion of the Property south of Hibler Road. This report is included with this submission and was submitted to the Army Corps of Engineers a jurisdictional determination.

4. *The proposed park layout avoids the majority of the existing fencerows located on the site. Staff believes that this approach helps to maintain the rural character of this area as well as provide buffering to help separate the various components of the park. However, significant areas of the fencerows have invasive and less desirable species such as Ailanthus and black locust. Staff would support the systematic removal of Ailanthus and black locust with the subsequent replacement of native deciduous mixed hardwood as noted on sheet 5 of the submitted plans. Staff recommends that the culling, stump treatment and replanting process be done incrementally. Staff also recommends that in areas where improvements are proposed adjacent to fencerows that the applicant engages an arborist to certify that trees in proximity of the improvements do not impose a safety hazard.*

The Applicant will work with a certified arborist or other qualified professional to establish a management plan for controlling and removing the invasive and less desirable species on site. The plan will include the phased treatment and removal of invasive species as well as the phased replanting of the fencerows with native trees. Prior to construction of improvements adjacent to fencerows, a certified arborist or other qualified professional will verify that trees in proximity of the proposed improvements do not impose a safety hazard.

5. *Staff recommends contacting the Virginia Department of Forestry (DOF) concerning the possibility of reforestation within the 250 foot campground setback and elsewhere on the*

Nicole Steele
July 1, 2009
Page Three

property. The DOF will provide guidance and other assistance for plantings in these areas. Areas designated as archaeological sites within the Potomac floodplain however should be avoided as tree plantings in the areas may prove detrimental to the site integrity. Including forest and tree conservation measures within the project is consistent with Forest, Trees and Vegetation Policies on Page 5-32 of the RGP.

The Applicant does not think it is appropriate nor necessary to provide additional buffering in this area at this time. Rather, the Applicant intends to allow the setback area to reforest naturally and will consult with the Department of Forestry for recommendations on spurring natural regrowth. Given considerations, we do not think it is necessary to provide additional buffering in this area.

6. *The Surface Water Policies within the RGP support the implementation of low impact development (LID) techniques (Page 5-17). Substantial portions of the property consist of soils that are moderately well to well drained. It is unclear from the plans what areas, including roadways, campsites, parking, and structures, will be impervious. Much of the upland portion of the property drains into an area consisting of very steep slopes, a farm pond, wetlands, and minor floodplain. Where impervious surfaces are needed, staff recommends incorporating infiltration measures for runoff.*

During the design phase of the associated site plan(s), the Applicant will abide by the Facilities Standards Manual and aim to incorporate low impact development ("LID") techniques and best management practices ("BMP") in regards to storm water management. However, as the site hydrology has not been analyzed at this time, the Applicant cannot commit to specific LID or BMP measures until overall drainage and runoff patterns are studied during the preparation of the construction plans.

7. *Staff encourages installation of water conservation measures into the project, such as low flow and waterless urinals in proposed restrooms. Including water conservation measures within the project is consistent with General Water Policies on Page 2-20 of the RGP.*

The Applicant's Mission Statement includes the tenet that the Park Authority is committed to "the conservation of regional natural and cultural resources." In accordance with this guidance, the Park Authority has installed waterless urinals and low-flow fixtures as part of recent renovations at its existing parks and anticipates installing similar water-conserving facilities at White's Ford Park.

8. *A Preliminary Soils Report was conducted for the upland (north of Hibler Road) portion of the property. Staff recommends conducting the same for the Potomac floodplain portion as well, in order to update County records concerning Prime Agricultural Soils as discussed in the RGP Page 5-24 (Prime Agricultural Soil Policies) and the Facilities Standards Manual (FSM) Section 6.130.*

The Applicant will provide Loudoun County with a Preliminary Soils Report for the Potomac Floodplain portion of the property at time of site plan.

Nicole Steele
July 1, 2009
Page Four

9. *Staff recommends avoiding impacts to two areas of archaeological importance described in the following text. These sites are:*

- a. 44LD0365
- b. 44LDA (temporary site number within WSSI report)

Staff notes that site 44LD0365, which is to be avoided in compliance with a Virginia Outdoor Foundation (VOF) No-Build Area, has been misidentified on the Virginia Department of Historic Resources maps and therefore is misidentified on the submitted plans. Thunderbird Archaeology has indicated that the site should be mapped on a terrace some 200-400 feet closer to the Potomac. Consequently the site is in an area designated to be a Park camp area. Staff recommends avoiding impacts to the site. Staff also notes that Thunderbird identified a new site (44LDA) along a terrace on the southwestern portion of the Potomac Floodplain. This site is a Late Woodland Village site. Surface collection has identified this as an extensive site that is quite shallow within the soil profile. This is also an area designated for camping. Staff recommends avoiding impacts to this site as well, either through avoidance or by minimizing subsurface disturbance. It is unclear from the current proposed plans what the impacts would consist of during the construction of camping spaces, parking areas, roadways, etc. Staff understands that additional archaeological work is planned for this site to further delineate the site both horizontally and vertically. It is unclear if this site will be subject to the VOF No-Build Area designation as well. The Policies regarding Historic and Archaeological Resources within the RGP, Page 5-35, discuss the County's interest in "the protection of these sites during the development process."

The Applicant commissioned Thunderbird Archeology to do a Phase I study for the southern portion of the Property. That report, which identifies the appropriate location of site 44LD0365 and establishes boundaries for site 44LDA, (now identified as site 44LD1541), is included with this submission. The campgrounds and parking areas that were previously located within these areas of archeological significance have been relocated. A road, however, will need to cross site 44LD0365 to provide access to the river, and Thunderbird has studied potential road crossings to identify areas that are void of artifacts. Those locations are identified on the revised Concept Sketch and Special Exception plat.

10. *Staff supports a built design with this application that helps to sustain the natural environment, consistent with Revised General Plan (RGP) language on page 5-2. Staff also commends the Northern Virginia Regional Parks Authority for registering the Temple Hall Farm Visitor Center for Leadership in Energy and Environmental Design (LEED) Certification. Accordingly, staff recommends that the applicant implement design measures that conserve energy and water consumption, minimize waste generated during construction, and maintain interior and exterior air quality. RGP policies supporting these design measures include policy one, page 2-20; policy two, page 2-23; policy one, page 5-5; and policy one, page 5-41.*

Several design approaches are available to achieve these goals, including LEED as administered by the United States Green Building Council; and Energy Star and Water Sense programs administered by the Environmental Protection Agency. The Board of Supervisors has endorsed LEED as the preferred green building rating system for non-residential construction

Nicole Steele
July 1, 2009
Page Five

through its support of the COG Regional Green Standard, available at <http://mwcoq.org/environment/greenbuilding/>. Loudoun County also participates with the Energy Star program and uses the Energy Star Portfolio Manager to benchmark energy efficiency for public facilities. Staff recommends incorporation of these design approaches and is available to discuss design options with the applicant, thereby meeting its role as "leader and facilitator" for achieving and sustaining a built environment of high quality, as directed by RGP policy one, page 5-5.

NVRPA, as an agency, is committed to sustainable building design at its facilities and will extend these commitments and techniques to its park facilities at White's Ford. In 2006, NVRPA was the first park agency in the country to adopt the Cool Counties/Cool Cities pledge to reduce greenhouse gases. As part of that commitment, NVRPA set an annual goal to reduce energy consumption by 5 percent agency wide and put in place an energy conservation plan at each of its parks, to track energy consumption and convert it to both BTU and carbon emissions, when possible. In addition, NVRPA pledged to stop increasing carbon emissions by 2010 and then reduce the output of carbon by 2 percent per year until 2050 (resulting in an 80 percent reduction).

In the first full year of the effort, total carbon emissions at NVRPA facilities were reduced well ahead of the Cool Counties goal. For example, efforts at Brambleton Regional Golf Course reduced consumption by 27 percent, saving enough energy in a year to heat and cool 103 average homes for a year. In 2007 Cameron Run Regional Park reduced its energy consumption by almost 21 percent.

In addition to the LEED certification for the Temple Hall visitor center, NVRPA has implemented the following energy-efficient techniques throughout its facilities: installing high efficiency lighting, including motion-sensing switches, and programmable thermostats, retrofitting buildings with more efficient windows and insulation, using high-efficiency pumps and geo-thermal heat pumps, actively generating solar power and introducing more electric utility, hybrid and natural gas vehicles in the parks.

Furthermore, NVRPA was the first park agency in the Mid-Atlantic to have its golf courses achieve Audubon International Cooperative Sanctuary status, including chemical use reduction and safety, water conservation and water quality management, and other program categories. And recently, NVRPA became the first park agency to partner with the U.S. EPA in its Pesticide Environmental Stewardship Program. This partnership grew out of NVRPA's cutting edge fertilizer and pesticide use policy that goes far beyond what is required by law.

Department of Fire, Rescue and Emergency Management (comments dated April 1, 2009)

1. *Staff respectfully requests that the applicant provide more detail regarding the internal road network. Staff is not able to evaluate emergency vehicle access and circulation throughout the parcel since the submitted plan does not show sufficient detail: road widths, proposed improvements, etc. Staff cannot provide a recommendation of approval until the requested information is provided.*

Nicole Steele
July 1, 2009
Page Six

The specifics of the proposed roadways have not been designed at this time. However, at the time of site plan submission, the Applicant will ensure all roadways are in conformance with the specifications of the Facilities Standards Manual and that the Property can accommodate emergency vehicles.

2. *Staff also recommends the applicant would consider installing a dry hydrant in the area of the boat ramp (with associated access road) to facilitate access to water for firefighting purposes not only for the proposed use but to protect neighboring uses.*

The Applicant cannot commit to this, as it does not control the water in the Potomac River; Maryland does. Extracting water from the Potomac without a contract in place with Maryland would cause problems that NVRPA is unwilling to undertake.

Department of General Services (comments dated March 19, 2009)

1. *DGS has reviewed the plans and since no stormwater concept was submitted, we reserve our comments until the project progresses to the development review stage.*

Comment acknowledged. Stormwater will be addressed at time of site plan.

Parks, Recreation and Community Services (comments dated March 25, 2009)

1. *Staff notes that the Applicant is proposing in their Statement of Justification to retain Hibler Road (Route 656) as a rural, gravel road. However, Staff is familiar with the existing conditions of the current road, and notes that the road is essentially one-lane wide in most places, and may not be able to adequately accommodate the potential traffic to and from a Regional Park. Furthermore, direct access to Hibler Road from Route 15 south of the subject property is served by Limestone School Road (Route 661). Limestone School Road crosses a fork of Limestone Branch over a one-lane bridge, which may not be able to adequately handle the volume of traffic to a Regional Park. In addition, since the subject property is located at the end of the state-maintained portion of Hibler Road, there is not a secondary point of access to relieve potential traffic. Given the desire and demand for public equestrian facilities, campgrounds and boat ramps on the Potomac River in Loudoun County, the Applicant may be underestimating the potential popularity of such facilities and the traffic impacts they may have on these rural roads.*

Hibler Road and Limestone School Road in the vicinity of the project site are two-lane, 20-foot-wide, unpaved rural roads. The unpaved road surface is consistent with the rural character of the surrounding farms and residences and acts as a traffic-calming measure as it limits operating speeds. The Applicant is proposing to maintain these roads largely in their current condition, in compliance with the Loudoun County Revised General Plan policy that states: "protecting the rural character and scenic quality of rural roads is fundamental to the rural strategy" (Revised General Plan, Chapter 7).

Nicole Steele
July 1, 2009
Page Seven

Although the proposed facility is a regional park, that name is driven by the Park Authority being a regional agency, not by the services offered at the park. The proposed development is expected to generate a maximum of 350 daily trips, which would occur over the weekend. When combined with the 150 existing trips, Hibler Road would be carrying 500 vehicles on a peak day. State and local rural road plans specify that rural roads that carry less than 1,000 vehicles per day can remain as unpaved, substandard roads to preserve the rural nature of the area. Therefore, the Applicant plans to leave Hibler Road in its existing, rural condition, which will be able to accommodate existing and anticipated traffic while maintaining the road's rural and scenic quality.

2. *Staff has reviewed the provided Traffic Study, and notes that the main studied intersection (Route 15 and Limestone School Road) currently operates at Level F for westbound traffic and will continue to do so throughout the build-out of the proposed park. However, no traffic mitigation measures are warranted or recommended. The Traffic Study adequately calculated current levels and future growth at the Route 15 and Limestone School Road, but did not take into account or make any recommendation on the existing condition of Hibler Road.*

No improvements are proposed at the intersection of Rt. 15 and Limestone School Road or along Hibler Road. The proposed park use is expected to generate less than 1 percent of the traffic at that intersection and therefore will not have any impact to speak of on the functionality of the intersection, which staff recognizes in this comment. That said, it should be noted that this intersection was recently improved by VDOT to include a 300-foot southbound left turn bay and a continuous northbound paved shoulder in order to facilitate conflicting movements in the major approach.

As stated above, the Applicant proposes to leave Hibler Road in its current, rural condition, a decision guided by the County's Revised General Plan and the state and local rural road plans that specify that rural roads that carry less than 1,000 vehicles per day can remain as unpaved, substandard roads to preserve the rural nature of the area.

3. *While PRCS supports the Applicant's intentions to preserve the rural quality and character of Hibler Road per the Revised General Plan, the Plan did not originally intend for a Regional Park to be located at the end of Hibler Road. The area around Hibler Road is very agricultural in nature and farm equipment frequently crosses and/or utilizes the roadway. The current road is narrow and contains several blind turns and dips that may be hazardous to park patrons, especially those pulling boat trailers to the proposed boat ramp on the river.*

There will be no swimming pool, ball fields or golf course at White's Ford Park, all significant traffic generators. Rather, the park, which is designed for campers, hikers and river users.

It should be noted that NVRPA is seeking up to 100 total camping sites. This is a slight increase from what was considered in the traffic assessment. Even with this change it is only expected to generate up to 172 weekday vehicle trips and at most 350 weekend daily trips. When added to the existing traffic on Hibler Road, collective trips remain below the 1,000-vehicle threshold that encourages rural roads to be upgraded and paved. In addition, it's important to note that the road's current design and surface serve as traffic calming measures

Nicole Steele
July 1, 2009
Page Eight

that tend to result in lower operating speeds of vehicles, and the posted speed limit is low in order to prevent accidents. The revised trip generation is discussed further in the VDOT response comments.

4. *Staff recommends that the Applicant consider improvements along Hibler Road to include widening the travel lanes and improving the shoulders and ditches along the road. The Applicant should consult directly with the Office of Transportation Services (OTS) and the Virginia Department of Transportation (VDOT) to better define what improvements are necessary.*

Per the previous response, no improvements are planned for Hibler road, which is both in keeping with the policies of the Revised General Plan that rural roads should be maintained in their current condition and guidance in the traffic study that the park traffic combined with existing traffic will be less than 1,000 vehicles per day, which can be accommodated by the road in its existing condition.

5. *Staff notes that Hibler Road (Route 656) serves up to eight (8) existing private residential lots and one (1) proposed residential lot beyond the subject property. Please provide more information on how the Applicant is proposing to accommodate through-traffic on Hibler Road within the park.*

Planned park operations will not interfere with the operations of Hibler Road, which will remain open to the public and accommodate traffic across the Property.

6. *Staff has reviewed the provided Archeological Investigations on the subject property. The property lies within the Catoctin Rural Historic District. The Phase I study for the northern +/-150 acres identifies three (3) sites that are considered to be potentially eligible for inclusion on the National Register of Historic Places, and avoidance of these sites or Phase II evaluations are recommended. Furthermore, an intensive architectural survey is recommended for the historic farm complex (including the Colonel White House). The Phase IA study for the southern +/-131 acres identified two (2) previously recorded sites and one new site, which was recommended for a full Phase I investigation.*

The Applicant will either avoid the identified areas of significance or commission localized Phase II studies before moving forward with development plans in any of the locations identified in the Phase I study. The Phase I study was conducted for the portions south of Hibler Road that the Phase IA study identified for further study; that study is included with this submission. As for the Colonel White House, it is not part of this application; however, when the Applicant moves forward with restoration plans, NVRPA will consult a historical architect.

7. *Staff notes that on the colored Concept Sketch, the Applicant is proposing to develop "Individual/Family Campsites and Youth Group Camping" within Site 44LDA and the revised Probable Location of Site 44LD0365. These areas include a high number of artifact locations (Phase IA Exhibit 16), are noted to have a high archeology probability (Phase IA Exhibit 19) and are recommended for avoidance and/or controlled surface collection (Phase IA Exhibit 20).*

Nicole Steele
July 1, 2009
Page Nine

PRCS recommends revising the proposed location of these campsites to avoid any impact or disturbance to these areas, as they may be significant in nature and may include human burials.

The Applicant commissioned Thunderbird Archeology to conduct a Phase I study in the areas identified as Site 44LDA and the revised probable location of 44LD0365 mentioned above. That report is included with this submission. The campgrounds and parking areas that were previously located within those areas have been relocated. A road, however, will need to cross site 44LD0365 to provide access to the river, and Thunderbird has studied potential road crossings to identify areas that are void of artifacts. The road crossings are identified on the revised Concept Sketch and Special Exception plat.

8. *In addition, the Applicant is proposing a "Colonel White House Interpretive Area" within Site 44LD1364 / VDHR 050-0012-0082. Staff requests more information on the proposed uses within the proposed interpretive area, and recommends that the Applicant coordinate any development in the area with the Virginia Department of Historic Resources, as the house and its ancillary structures are considered to be a contributing architectural resource to the Catoctin Rural Historic District.*

Any interpretive area associated with the Colonel White House is not part of the special exception application before staff. When NVRPA is ready to move forward with this interpretive area, it will contact the Virginia Department of Historic Resources.

9. *PRCS requests that the aforementioned recommended Phase I and Phase II investigations be completed as a Special Exception Condition of Approval prior to Site Plan (STPL) approval. Furthermore, PRCS recommends that the Applicant apply for applicable listings on the National Register of Historic Places for the Colonel White House farmstead.*

The Applicant commissioned a Phase I study for the areas south of Hibler Road that were identified in the Phase IA study as having the potential for containing a high-level of artifacts, having archeological probability or being recommended for avoidance. That report is included with this submission and the Concept Sketch and Special Exception plat have been revised to relocate facilities out of those areas. If an area identified in the Phase I study cannot be avoided, the Applicant agrees to commission a Phase II study for that specific area before impacting it. Because of the Property's size, the Applicant finds it superfluous to automatically conduct such extensive studies for the entire Property, when so much of it will be left undisturbed. As for the Colonel White House, it is not a part of this application.

10. *Staff notes that there are two separate Plat Notes (#7 and #18) on Sheet 1 discussing different identified Archeological Resources. Please revise or explain this discrepancy.*

The notes on Sheet 1 have been clarified.

11. *Staff has reviewed the provided Wetlands Delineation Report on the subject property. The report states that there are several locations where areas of palustrine emergent wetlands and stream channels have been significantly disturbed by previous and current cattle operations*

Nicole Steele
July 1, 2009
Page Ten

on the subject property. PRCS recommends that the Applicant consult with the United States Army Corps of Engineers (USACE) and the Loudoun County Environmental Review Team (ERT) on methods for restoring and enhancing these critical environmental resources and habitats. Specific restoration methods should be included as a Special Exception Condition of Approval prior to Site Plan (STPL) approval.

As noted above, the wetlands were disturbed by past operations and are not a cause of the proposed park use; therefore, the restoration of those areas cannot be required as a Special Exception condition. However, the Applicant will consult with the Army Corps of Engineers and/or ERT for recommendations on mitigating the existing disturbances that are identified in the Wetlands Delineation Report and will implement the appropriate methods at its discretion as funding permits.

12. The Special Exception Plat shows potential impact to wetlands and stream corridors throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to wetlands and stream corridors will be mitigated.

The Applicant will obtain all necessary state and federal permits prior to disturbing any jurisdictional waters or wetlands. In addition, the applicant will make a good faith effort to mitigate impacts to wetlands in accordance with the hierarchy of wetland mitigation established by Loudoun County and recommendations from the Army Corps of Engineers.

13. The Special Exception Plat shows potential impact to moderately steep slopes throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to moderately steep slopes will be mitigated.

The portion of the road mentioned above provides access to the house, not the campsites and other park facilities, and will be maintained in its current condition. Since that road will not be altered, nor will it serve to carry large amounts of park traffic, no impacts to the surrounding topography are envisioned. To clearly differentiate between the function of this road—which is intended to provide access to the house, if needed—and the roads that will serve the camp sites, the Concept Sketch has been revised and different emphasis has been placed on the different types of roads.

14. The Special Exception Plat shows potential impact to minor floodplain throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to minor floodplain will be mitigated.

Nicole Steele
July 1, 2009
Page Eleven

As stated above, no changes are envisioned to this road, which will continue to serve the house, not the park facilities that are part of this application. Should this roadway need to be widened or re-aligned, an associated floodplain alteration application will be prepared and submitted at that time.

15. *Staff notes that per the colored Concept Sketch, campsite areas, restrooms/showers and picnic pavilions are located within the Potomac River major floodplain. Typically, structures such as restroom/shower facilities and picnic pavilions are not permitted within a major floodplain. In addition, please provide more information on what type of amenities are proposed within each campsite (e.g., tent pads, picnic tables, lantern posts, water spigots, etc.).*

The Concept Sketch has been revised to more accurately reflect what will be located in the floodplain; however, the specific details and locations of amenities have not been decided. That additional detail will be provided at time of site plan.

16. *Please provide a Phasing Plan for the proposed development of the park. Staff notes that phasing appears to be proposed in the Traffic Study, but not clearly discussed on the Plat or within the Statement of Justification.*

The uses requested in this Special Exception application—the boat ramp and camp sites—are all included in the Phase 1 identified in the traffic study. A detailed phasing plan is not required as part of a Special Exception application.

17. *Staff notes that a land development application for the subject property, Gianna Terra (SBPL 2006-0084) was approved on July 10, 2007. Please revise the Preliminary Soils Review (PSR) note on Sheets 1 and 2 to include the previous land development application number for which the PSR was submitted.*

These notes have been revised.

18. *Staff requests more information concerning the proposed “passive” uses within the park. Please provide additional details and/or illustrative drawings to better describe the proposed camping cabins/yurts, picnic pavilions, restrooms/showers and the “incidental seasonal” (temporary) concession/boat rental facility per Special Exception Checklist Item K6a.*

The location and design of the park’s facilities are still conceptual in nature. As the plans evolve, additional detail will be provided at time of site plan. At present, the Applicant anticipates a few group camping sites, approximately 100 family campsites and 10 cabins; however, this mixture of overnight facilities may change as plans develop but collectively will not exceed the 100 sites permitted for Level II campgrounds as defined in Section 5-646 (A) of the Zoning Ordinance. Any concession/boat rental facility would be located proximate to the boat ramp and be less than 840 square feet, which is permitted by-right in the Floodplain Overlay District. Restrooms are planned to be located north and south of Hibler Road, but the exact location and design of those facilities, which are permitted by-right, have not been determined. Picnic shelters, also a by-right use, will be provided and disbursed throughout the Property. The

Nicole Steele
July 1, 2009
Page Twelve

Applicant has vast experience and success creating and managing parks throughout Northern Virginia and will use that knowledge to ensure uses are located appropriately throughout the site to ensure compatibility and ease of use.

19. *Please provide more information of the proposed boat launch and rentals. While a boat launch/ramp is permitted by Special Exception, the Revised General Plan, Chapter 5, River and Stream Valley Corridor Policy 18.i, states that in order to “support or enhance the biological integrity and health of the river and stream corridor... Active recreation on the rivers and streams only – including swimming and boating (non-powered) (where specified public points of entry have been identified).”*

The Applicant anticipates 20-weekend boat launches and two weekday boat launches, the majority of which will be canoes or kayaks. These estimates are based on the usage trends at Algonkian Regional Park in eastern Loudoun, which experiences an estimated seven launches a day. The launches expected at White's Ford are below those seen at Algonkian because the proposed park is in a less populated area. The majority of boat launches from the Applicant's similar parks are by non-motorized vessels, (60% at both Algonkian and Fountainhead Regional Park in Fairfax) although some fishermen do launch their flat-bottomed boats from the parks.

20. *Please provide the proposed number and type (individual vs. group) of campsites within the park.*

The Applicant is applying for a Level II campground, which permits between 50 and 100 campsites, independent of whether they are for individuals or groups. Currently, the Applicant envisions approximately 60 individual campsites, 10 cabins and several group camping areas, although these numbers may change before site plan. Regardless of the mix of facilities, the number of campsites will not exceed 100.

21. *Please provide more information on uses and structures within the proposed Future Equestrian Facility per the colored Concept Sketch. It appears that a large portion of it is located within an identified archeological resource area.*

The equestrian facility, which is a by-right permitted use, is not part of this application. It is only shown in concept at this point, with details to be worked out at a later date.

22. *Please provide more information on the proposed Event Areas (e.g., types of events, proposed temporary structures, parking requirements) per the colored Concept Sketch.*

The event area is not part of this application and has been removed from the Concept Sketch.

23. *Please provide more information on the proposed Colonel White House Interpretive Area per the colored Concept Sketch.*

The Colonel White House and any related interpretive features are not part of this application.

Nicole Steele
July 1, 2009
Page Thirteen

24. *Please provide a detail of the existing homestead area (proposed Colonel White House Interpretive Area), including all of the structures listed in the chart on Sheet 2 of the SPEX Plat, and how they relate to the proposed uses; currently Sheet 2 is difficult to read. In addition, please provide Plat Labels as to whether or not the existing structures are to remain or be removed.*

Although the Colonel White House and any associated structures are not part of this application, the Concept Sketch has been revised to label these structures. As stated in the application, the house will be maintained. Additional existing structures may be maintained and reused as part of the park's facilities.

25. *Please demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the proposed parking will meet Section 5-100 of the Revised 1993 Zoning Ordinance per Special Exception Checklist Item K6b.*

Because so much of the plan is still conceptual, the Applicant requested and received a waiver from submitting a parking analysis. At time of site plan, the Applicant will provide parking in accordance with the Zoning Ordinance requirements.

26. *Staff requests more information on the proposed Primary and Secondary Roads and parking/loading areas throughout the park (e.g., travel lane widths, pavement materials, number of parking spaces etc.) per Special Exception Checklist Items K10b and 11. It appears on Sheet 4 that the proposed parking area for the boat launch may be undersized to accommodate multiple boat trailers. Please also provide more information on where would overflow parking be located.*

Because so much of the plan is still conceptual, the Applicant has not designed the parking areas or roads as specified above. At time of site plan, the Applicant will provide parking in accordance with the Zoning Ordinance requirements and ensure that the roads and parking are sufficient for the anticipated users. In addition, the Applicant will work with VDOT to ensure that the entrance to the Property is sufficient.

27. *Staff notes that for the previous land development application SBPL 2006-0084, the property owner drilled and located multiple test wells and drain fields for residential use. Staff requests more information on which wells and drain fields will serve the proposed facilities and if they are adequate for the proposed commercial uses.*

It is premature to identify what wells or drain fields will serve the proposed facilities since the exact locations of those facilities have not been determined. In terms of these facilities, the Applicant will meet health department requirements at time of site plan.

28. *Staff requests more information concerning the proposed residential "outlot" straddling Hibler Road surrounded by the proposed park.*

This outparcel is not part of the application.

Nicole Steele
July 1, 2009
Page Fourteen

29. Staff requests more information about the Virginia Outdoors Foundation (VOF) easements on the property, including the associated recorded deeds, descriptions, and resources that the "No-Build" areas are protecting.

The Applicant has consulted with VOF as it has planned its park facilities and received a preliminary determination from VOF that the proposed park uses are compatible with the easement restrictions as no facilities are planned for any of the No-Build zones established by VOF. The No-Build Zones north of Hibler Road are on the high points of the land and protect the scenic values of the Property, while the No-Build zones south of Hibler Road protect archeological resources. NVRPA will continue to coordinate its plans with VOF and will obtain any approvals from VOF necessary for compliance with the easement

30. The colored Concept Sketch graphically delineates hiking/equestrian trails and Sheets 3 and 4 of the Special Exception Plat do not. Please revise and/or explain this discrepancy.

There is no discrepancy. The Special Exception Plat only lists those uses for which a special exception is needed. The majority of the proposed uses are permitted by right, so they are left off of the Special Exception Plat. The Concept Sketch, on the other hand, includes both by-right and special exception uses that are planned for the park.

31. PRCS has been directed by the Board of Supervisors to act as the lead agency for the design and implementation of the Potomac Heritage National Scenic Trail (PHNST) in Loudoun County. PRCS requests the opportunity to work with the Applicant in establishment of a section of the PHNST on the subject property, per the Revised General Plan, Chapter 5, Scenic Rivers and Potomac River Policy 10. Furthermore, Sheets 3 and 4 of the Special Exception Plat should be revised to graphically delineate and label a proposed alignment for the PHNST.

The Applicant is a partner in creating this trail and will preserve the ability to extend this trail through the Property. However, until easements are acquired for the adjacent sections of the trail, it is impossible to determine the exact location and dimension of the trail through the Property, and therefore inappropriate to depict any such alignment.

Virginia Department of Transportation (comments dated March 27, 2009)

1. Show the estimated traffic generation using acreage for comparison with the estimates using number of employees. Why does the traffic consultant feel that estimates based on the size of the park are less representative than estimates based on number of park employees?

Traffic generation for the Property was studied according to acreage and the number of employees. This was done because the ITE code for regional parks does not differentiate between a park's facilities. In other words, ITE assigns the same number of trips to a 100-acre park filled with ball fields and a swimming pool as it does to a 100-acre park whose only feature is hiking trails. It is important to recognize that all of NVRPA's parks, independent of their size

Nicole Steele
July 1, 2009
Page Fifteen

or the services offered, are considered regional parks because the Northern Virginia Regional Park Authority is regional in nature.

Because traffic is generated by the amenities provided within the park, and employees are needed to service those amenities, the Applicant found it more appropriate to estimate traffic based on the number of employees who will staff the park. Upon calculating the traffic numbers this way, the Applicant compared the estimates with the trip generation at its other parks and found the numbers to be very consistent.

Table A below presents the trip generation comparison between the size of the property (in acres) and the anticipated number of employees obtained from NVRPA.

Table A: Trip Generation based on ITE Land Use Code 417 – Regional Park

Size	----- Weekday -----								----- Weekend -----							
	AM Peak Hour			PM Peak Hour			Daily Total	Total	Sat. Peak Hour			Daily Total	Sun. Peak Hour			Daily Total
	In	Out	Total	In	Out	Total			In	Out	Total		In	Out	Total	
275 Acres	24	18	42	32	40	72	1,257		46	48	94	1,554	40	76	116	1,771
2 Emp.	9	6	15	12	14	26	160		17	17	34	257	14	27	41	326

It should be noted that the Applicant is now seeking up to 100 family camping sites. This is a slight increase from the number assumed in the traffic assessment. Based on this assumption, the trip generation given in the Traffic Impact Analysis on page 16, Table 4B should be replaced with Table B below. This change in campsites results in a small increase of 7 more weekday trips and up to 15 more weekend daily trips.

Table B: Proposed Trip Generation based on ITE and NVRPA Estimations (100 Total Campsites)

Land Use	----- Weekday -----								----- Weekend -----							
	AM Peak Hour			PM Peak Hour			Daily Total	Total	Saturday Peak Hour			Daily Total	Sunday Peak Hour			Daily Total
	In	Out	Total	In	Out	Total			In	Out	Total		In	Out	Total	
Proposed Park	10	6	16	13	15	28	172		19	18	37	276	15	29	44	350

2. *Provide additional background on the sources of the NVRPA attendance estimates and related vehicle occupancy assumptions (Tables 4A and 4B and Appendix A).*

The Applicant's attendance estimates are based on its 50 years of experience operating regional parks with facilities similar to what is being proposed at White's Ford. Vehicle occupancy assumptions are based on familiarity and observations by park managers for comparable uses, adjusting for differences in geographic location, population density, presence or absence of high-use facilities such as a waterpark or golf course, and user trends.

Nicole Steele
July 1, 2009
Page Sixteen

3. *Would any site-generated trips use Route 657 Spinks Ferry Road in preference to Route 661 Limestone School Road to access the site? Since Route 657 is paved from Route 15 to Route 661, it may be desirable to publicize Route 657 as a route to the park.*

No site traffic was assigned to the intersection of US Route 15 and Spinks Ferry Road because the US Route 15 and Limestone School Road intersection is closer to the project site, has an exclusive 300-foot southbound left turn bay and a continuous northbound paved shoulder. In addition, less traffic uses Limestone School Road than Spinks Ferry Road.

4. *This development will at least double the weekday traffic on Route 656 Hibler Road, and significantly increase traffic on Route 661 Limestone School Road, which are narrow, unpaved, substandard roads. Any improvements provided through the development process will be desirable. At a minimum, we would expect this development to improve the lanes, shoulders, and ditches of Route 656 Hibler Road along the site frontage in accordance with standard GS-4.*

According to VDOT's 2007 historical traffic count data, Hibler Road carried approximately 150 vehicles per day based on 2002 traffic counts. No growth was reported along this road between 2002 and 2007. The proposed development will generate a maximum of 350 daily trips, where peak usage will occur during the weekends, for a total of up to 500 vehicles per day. As part of state and local rural road plans, rural roads carrying less than 1,000 vehicles per day can remain as unpaved, substandard roads in order to preserve the rural nature of the area. Any road widening would severely alter the rural condition of Hibler Road by causing portions of the existing mature tree line to be removed.

Zoning Administration (comments dated March 20, 2009)

1. *The parcel is within an Open Space Easement (200712060084868 OSE) granted to the Virginia Outdoors Foundation. The Virginia Outdoor Foundation will need to review the submitted application to ensure compliance with the regulations of this easement.*

Understood. The Applicant has worked with the Virginia Outdoors Foundation ("VOF") on these plans and will continue to show these plans to the VOF as they progress.

2. *All uses/structures associated with the campground need to be shown on the special exception plat for the minor special exception, including any required service buildings. The illustration title "Concept Sketch" dated 8/1/08 revised 11/24/08, shows several restrooms/showers, which would typically be uses associated with a campground. It would appear the park office would be used for registration of incoming campers. If associated with the campground, these structures will need to be located outside of the 250' campground setback. Include any maintenance buildings, playground areas, picnic pavilions, etc.*

The Applicant is aware that any uses associated with a campground can be no closer than 200 feet from the property line to comply with the 200-foot setback required for Level II campgrounds. Any related structures have been shifted to adhere to this property-line setback requirement and a note has been added to the special exception plat that states that any

Nicole Steele
July 1, 2009
Page Seventeen

restroom, playground, picnic area or other campground-related facility will be located outside of this 200-foot setback. That said, there will be some general park facilities that may be located within that 200-foot setback, so long as that facility is unrelated to the campground.

3. *The square footage of all structures located within the major floodplain will need to be given. Should any of these structures, including picnic pavilions, located in the floodplain be larger than 840 square feet, a special exception per Section 4-1506(F) will be required.*

The Applicant acknowledges that unless a special exception is sought and granted, structures in the floodplain cannot be larger than 840 square feet.

4. *For both the campground and boat launch, any overlays not related to the application should be removed from the plat, such as the approved drain field locations. Any setbacks associated with the campground use should not be shown on the boat launch special exception plat.*

These overlays and drain field locations have been removed from the special exception plat.

5. *As the limits of the major floodplain along the Potomac River extend beyond the scenic creek valley buffer setback, the scenic creek valley buffer does not apply. Please remove the label.*

The label has been removed.

6. *Section 5-646(E)(3)(b) allows a campground no more than 2 points of access to a public road, not including access points for emergency vehicles only. The special exception plat is showing 4 points of access to Hibler Road.*

Campgrounds are divided into two areas, one north and one south of Hibler Road, each of which is permitted two access points. Although four internal roads provide access to Hibler Road, only three of those roads serve the campground facilities: two serve the campgrounds north of Hibler Road and one serves the campgrounds south of Hibler Road. The fourth road exists today as access to the Colonel White House on the property. It will continue to serve the house, not the campgrounds, although it may serve as a secondary access in an emergency, should that be necessary.

The Special Exception Plat has been revised to differentiate the road serving the house from those providing access to the campgrounds.

7. *A portion of the road adjacent to the yurt/cabin area for the campground extends beyond the 250' campground setback.*

Roads that provide access to the campgrounds have been removed from the 250-foot setback.

8. *Under zoning requirements, the campground is listed as a Level II medium scale. It*

Nicole Steele
July 1, 2009
Page Eighteen

would appear the correct level should be Level III, Large Scale.

The Applicant has reviewed the camping facilities proposed at White's Ford Park and is confident a Level II medium scale campground is the appropriate level. Level II facilities permit up to 100 campsites with 16,000 square feet of related structures, not including any tent platforms. The Special Exception Plat has been revised to reflect a Level II facility.

9. *Address the location of parking areas associated with the campground use and label on the plat.*

A parking space will be provided with each campsite or cabin. Because visitors to the individual/family campsites normally park adjacent to their campsite, the need for a large parking area is not anticipated. However, two parking lots are envisioned that would serve multiple amenities on the Property, including campsites, should overflow parking be needed. One parking area will be located north of Hibler Road and a second south of Hibler Road to serve the boat ramp and camping facilities. The parking areas have been indicated on the Concept Sketch; their exact location will be determined at site plan.

10. *The parcel contains areas of very steep and moderately steep slopes. The eastern most entrance on the north side of Hibler Road will be located in proximity to the very steep and moderately steep slopes. Ensure the road/driveway can meet the requirements of Section 5-1508(E)(4).*

This is an existing gravel driveway that will continue to provide access to the Colonel White House. No improvements are anticipated to this road as part of the application. However, the Applicant is aware of the site's topography and should future improvements be needed will ensure this roadway meets the standards of the County's Facilities Standards Manual as well as section 5-1508 (E) (4) of the Revised 1993 Loudoun County Zoning Ordinance.

11. *The sheet titled Concept Sketch shows two event areas, a future equestrian facility and the Colonel White House interpretive area. Should any of these uses be associated with the campground, they will need to be shown on the special exception.*

These uses are not associated with the campground.

Department of Conservation and Recreation (comments dated March 26, 2009)

1. *Due to the potential for this site to support populations of natural heritage resources, DCR recommends an inventory for the Wisconsin snaketail in the study area from late April to mid-May. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.*

Nicole Steele
July 1, 2009
Page Nineteen

The Applicant engaged the Natural Heritage division of the Virginia Department of Conservation and Recreation to inventory the site for this species. No Wisconsin snaketails were found on the Property. DCR's report is included with this submission.

2. *In addition, to minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR also recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations.*

All design and construction activities will be in accordance with local and state regulations for erosion and sediment control and stormwater management / best management practices.

Office of Transportation Services (comments dated April 13, 2009)

1. *It is not clear from the traffic study whether the applicant is seeking approval for any Phase II uses. The study indicates that these activities have not been "finally determined," and also states that no additional traffic is anticipated. However, depending on what uses are proposed, this may or may not be the case. Please clarify.*

The applicant only has near-term plans for those uses identified in Phase I. Should the Applicant choose to further develop the by-right park, some or all of the uses identified as Phase II uses may be provided. However, no additional staffing or traffic are associated with Phase II; rather, those additional recreational activities and uses would complement the Phase I uses.

2. *Gorove/Slade notes that existing traffic counts were conducted on Tuesday, November 11, 2008 a federal holiday. In addition, additional "spot counts" were conducted on November 18, 2008 in order to adjust the counts conducted on the 11th. OTS questions why 1) Gorove/Slade chose to conduct traffic counts on a federal holiday; 2) how the "spot counts" were used to adjust the original counts; and 3) why new AM and PM peak hour counts were not conducted.*

The critical count measure at this location was the through traffic along Route 15. Historical counts and VDOT ADT data were a primary source of data. In addition, counts were conducted on two separate days to get through and turning traffic at this location. In order to expedite the analysis prior to the holiday season, counts were performed on November 11, 2008, a federal holiday, but not a Loudoun County School holiday. To clarify that the federal holiday did not substantially alter traffic patterns, follow up counts were conducted the following week. The follow up counts, or spot counts, are a means of focusing in on the critical peak hour and doing a full update of that hour. They are essentially new AM and PM counts, just during a focused time period. "Spot counts" were used to adjust the original counts obtained on November 11 in order to reflect actual traffic conditions during a typical weekday. An increase was applied to the volumes obtained on November 11 to account for the difference in traffic between a typical weekday and a federal holiday. OTS was consulted prior to proceeding with the data collection on November 11, 2008. The count schedule was accepted with the understanding that follow-up spot counts would be conducted to validate and update the data taken November 11.

Nicole Steele
July 1, 2009
Page Twenty

3. *OTS is concerned about the unacceptable LOS on westbound Limestone School Road at US 15. The traffic generated by the proposed uses will exacerbate this situation. OTS recommends that the applicant make a fair share contribution for the purpose of constructing a traffic signal at this intersection when warranted. Preliminary calculations indicate that this contribution should be approximately 16% of the cost of the traffic signal at the time of construction. OTS is available to discuss this issue further with the applicant.*

Nicole Steele
July 1, 2009
Page Twenty-One

The intersection of US Route 15 and Limestone School Road currently operates and will continue to operate at an unacceptable LOS on westbound Limestone School Road at US 15. Therefore, the costs of any needed improvement would be spread among the traffic generators that currently exist, not the proposed park facility, which would contribute less than 1 percent of the total traffic projected at this intersection. However, no mitigation measures have been recommended because there is not enough volume on the westbound approach to warrant roadway/signal improvements under existing and future scenarios based on the traffic analysis. Therefore, the applicant finds it outside its mitigation measures to contribute to the installation of a traffic signal at the study intersection now or if warranted in the future.

4. *Gorove/Slade provides a signal warrant analysis in Appendix H of the TIA. This signal warrant analysis is based on "Estimated Average Daily Traffic" ("To be used only for NEW INTERSECTIONS or other locations where actual traffic volumes cannot be counted.") The volumes used in this analysis appear to be less than actual existing counts from several years ago as provided in the traffic study. The analysis should reflect projected conditions at site buildout. Please explain the methodology used for this analysis.*

As agreed upon at the scoping meeting, a traffic signal warrant analysis was performed at the intersection of US Route 15 and Limestone School Road under future conditions with development (2015) based on the Manual on Traffic Signal Design (MTSD) guidelines. A full traffic signal warrant study was not required.

The future volumes with the proposed development were considered in the traffic signal warrant analysis. They were multiplied by 10, which is a k-factor commonly used in the transportation engineering field, to estimate average daily traffic at the study intersection. Therefore, these volumes were higher than the actual recorded counts since an inherent growth rate of 3 percent compounded annually over a seven-year period was added to the existing through traffic on US Route 15 to account for regional increases in traffic due to background growth and development outside of the study area. Please refer to Figure A and Appendix H in the Traffic Study for traffic volume comparisons.

5. *The applicant notes in their Traffic Impact Analysis (TIA) that a right-turn taper is warranted on northbound US 15 (Appendix H). The applicant should construct the warranted taper.*

A wide shoulder was recently added, as part of a VDOT project, to northbound US 15 at its intersection with Limestone School Road to allow northbound cars to pull over and make a right turn onto Limestone School. The shoulder was considered the best alternative at the time of its installation. Although not included in the TIA, it should be noted that a review of existing volumes shows that a right-turn taper is warranted under existing conditions. Should this shoulder be converted into a right-turn taper, the Applicant will contribute its fair share toward the restriping of the current asphalt area once the County is in receipt of the remaining money.

Nicole Steele
July 1, 2009
Page Twenty-Two

6. *There are several stream crossings along the roadways leading to the proposed site. In particular, OTS is concerned that the one-lane bridge stream crossing on Limestone School Road (west of Temple Hall Lane) will cause conflicts with opposing traffic towing boats. The applicant should work with VDOT to ensure that the traffic generated by the proposed uses has no adverse impact on the operation of the local road network, particularly with respect to these crossings. One option to address the one-lane bridge concerns may be to investigate having park patrons enter the park via Limestone School Road and exit via Spinks Ferry Road. Such a traffic management scheme could potentially improve the LOS at Limestone School Road and reduce conflicts at the above-mentioned bridges. However, changes to the traffic management scheme would necessitate the applicant revise the TIA and investigate the LOS at Spinks Ferry Road. Further discussion with VDOT is necessary.*

The Applicant anticipates 20-weekend boat launches and two-weekday boat launches, the majority of which will be canoes or kayaks, which are carried on top of the car and not in boat trailers. These estimates are based on the usage trends at Algonkian Regional Park in eastern Loudoun, which experiences an estimated seven launches a day, and at Fountainhead Regional Park in Fairfax, both of which have 60% of launches by car-top. The launches expected at White's Ford are below those seen at Algonkian because the proposed park is in a less populated area. With so few daily boat launches, a conflict on any one of the bridges would be rare and could easily be mitigated by establishing a yield pattern.

It is unlikely that Park traffic would utilize Spinks Ferry Road because its intersection with US 15 is quite far from the site. As noted by OTS, a change in the site distribution would affect the entire traffic study since it was previously agreed that the intersection of US Route 15 and Spinks Ferry Road did not need to be studied.

7. *OTS recommends that the applicant ensure there is adequate parking within the proposed park. As noted by the applicant in its special exception plat, specific number and location of parking spaces will be determined at site plan approval. OTS will defer to the Department of Building and Development (Zoning Administration) for their findings and recommendations.*

The Applicant will ensure that parking complies with all regulations, at time of site plan.

8. *The applicant notes in their TIA, in Appendix A, that no Recreational Vehicles or 5th-wheel trailers will be allowed in the park. OTS welcomes this restriction and believes that this should be included as a condition for approval.*

Rather than set a restriction on a certain type of vehicle, the Applicant finds it more appropriate to restrict vehicles based on their length. Therefore, the Applicant will agree to restrict vehicles that are greater than 25 feet in length and trailers that are greater than 25 feet in length. However, should Hibler Road be improved at some point, the Applicant proposes that the length limitations increase to 35 feet for an individual vehicle and 35 feet for a trailer.

Nicole Steele
July 1, 2009
Page Twenty-Three

9. *OTS recommends that the applicant ensure that the future road connecting existing Hibler Road to the proposed boat launch be built to private road standards as established by the FSM. OTS defers to the Department of Building and Development (Zoning Administration) for their findings and recommendations on the road classifications.*

Comment acknowledged.

10. *OTS recommends that the applicant ensure that all internal roads and existing Hibler Road are upgraded or built to FSM standards to provide safe pedestrian and horse crossings.*

Please do not hesitate to call or email with any questions. We look forward to being scheduled for public hearing in September.

Comment acknowledged.

Warmest regards,



Colleen Gillis Snow

cc: Todd Hafner, Northern Virginia Regional Park Authority
Kate Rudacille, Northern Virginia Regional Park Authority
Lou Canonico, christopher consultants
Brian Nolan, christopher consultants
Tushar Awar, Gorove Slade
Molly Novotny, Cooley Godward Kronish LLP